

Exhibit G

THE SUPREME COURT OF THE STATE OF DELAWARE
BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the) Board Case No. 115327-B
Supreme Court of the state of Delaware) Misc. 541
Meghan M. Kelly, respondent.)

RESPONDENT’S MORE PARTICULARIZED MOTION TO SUSPEND HEARING TO ALLOW OPPORTUNITY FOR HER TO RESEARCH AND PREPARE A DEFENSE, AND REQUEST FOR OPPORTUNITY TO DRAFT REQUESTS FOR ADMISSION, INTERROGATORIES AND SUBPOENA OPPOSING COUNSEL AS WITNESS, AS A NECESSARY WITNESS TO HER DEFENSE, AND SUBPOENA OTHER NECESSARY WITNESSES, INCLUDING BUT NOT LIMITED TO, CHIEF JUSTICE COLLINS J. SEITZ, JUDGE KENNETH S. CLARK, JR., DUE TO HIS ADMISSION HE INTERROGATED ME BASED ON MY EXERCISE OF FUNDAMENTAL RIGHTS INCITED BY THE ODC, AND ARLINE SIMMONS, TO SHOW UNCONSTITUTIONAL MOTIVE FOR THIS PETITION, TO ALLOW THE ACCUSED, RESPONDENT AN OPPORTUNITY TO DEFEND HERSELF ON THE DEFENSE ILLEGALITY OF PROCEEDING, AS APPLIED TO HER, MOTIVATED BY DISDAIN FOR HER RELIGIOUS ASSOCIATED BELIEFS AND EXERCISE OF FUNDAMENTAL RIGHTS, AND LACK OF JURISDICTION BASED ON THE DELAWARE SUPREME COURT’S APPARENT PARTICIPATION IN INCITING THIS PETITION AGAINST THE RESPONDENT

AND NOW this January 15, 2022, respondent, Meghan M. Kelly, pro se, contemporaneously with her Motion for an Immediate Emergency Determination, pursuant to the Substantive and Procedural Due Process Clause and the Equal Protections Clause applicable to the state pursuant to the 14th Amend., and the 1st Amend. applicable to the state pursuant to the 14th Amend., and Del. Lawyer’s R. Disciplinary Proc. 2 (c) brings this motion, simultaneously with a motion for

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immediate relief to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.

1. On December 18, 2021, I filed a letter motion to the Board, objecting to the improper notice of the original hearing date, apprising the Board of my objection to the Delaware Supreme Court's appointment of counsel, despite my notice of objection to the court, the need to perform discovery and an opportunity to prepare a defense after a determination on counsel is made, and noticed the Board I desired to file motions to dismiss prior to the hearing, and require opportunity to be heard on such motions.

2. The Board and Patricia Swartz received the December 18, 2021 on December 22, 2021, per the Post office's tracking information. (Ex A).

4. On December 29, 2021, I also filed a letter with the Board, the Court and Patricia Swartz, concerning the need for opportunity, and time to prepare my defense against the state based on illegality of proceeding, as applied to me, and based on lack of subject matter jurisdiction. (D.I. unknown incorporated in its entirety by reference, (Ex. B Proof of postage)).

5. In my Answer to the Petition, I apprised the Board and Patricia Swartz of my defense of illegality of proceeding, and requested dismissal based on lack of subject matter and illegality of proceeding, as applied to me, a party of one, motivated by the State to bring the petition to punish me for the exercise of my fundamental rights, in violation of the Equal Protections Clause and the Procedural and Substantive Due Process Clause for disparate treatment against me based on my religious beliefs. (D.I. unknown, incorporating Respondent's Answer to petition in totality, with exhibits thereto).

6. I followed up on the receipt status of my December 18, 2021 motion numerous times with the Board.

7. Since there was no response, until January 10, 2021, albeit an informal response, less than 3 full days prior to the scheduled hearing, I was compelled to draft a motion simultaneously before the Delaware Supreme Court

and the Board, to prevent waiver of my fundamental rights, and the ability to exercise my protected activity without interference and retaliation by the state, but for my exercise of First Amendment rights, filed January 11, 2022. (D.I. unknown, incorporating my January 11, 2022 motion, in toto, by reference,

8. On that same day, the Board provided an order on the January 11, 2022 motion, which rendered the December 18, 2022 motion moot, since I requested the same relief.

9. I was not afforded a fair and impartial opportunity to be heard on December 18, 2021 motion, nor on a second outstanding motion served December 31, 2021, via First Class mail, relating to *Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs; Memorandum of law in support of this motion and exhibits thereto, dated December 31, 2021.* (D.I. unknown, December 31, 2021 Motion incorporated herein in totality)

10. On January 12, 2022, I made a motion to the Delaware Supreme Court appealing the Order of the Board. (D.I. unknown, incorporated in toto, especially exhibits by reference of the Jan. 11, 2022 motion to appeal in its entirety, and apologizing for typos, and requesting mercy in light of the immediate).

11. Patricia Swartz, opposing counsel, appeared to develop a response to a new motion, I did not make, or an old motion rendered moot as asked and answered, appearing to possibly miss the filing deadline, exceeding 20 days in responding. (Ex. C)

12. Patricia Swartz made such response, to harass and distract me, knowing I do not have a fair and adequate amount of to time to gather facts, subpoena witnesses and to prepare a defense, including research. Otherwise, I would not have petitioned the Court for opportunity to defend my life and case in conformity with the Procedural and Substantive Due Process requirements, without disparate treatment by the state, motivated by impermissible reasons, for my exercise of fundamental rights, my poverty, and my religious associated beliefs, in violation of the Equal Protections Clause applicable to the state.

13. On January 12, 2022, I also Emailed two corrections on my Motion to appeal. I am not afforded the luxury of time in this matter, in violation of the procedural due process clause's opportunity to be heard to file a formal amendment due to the emergency, immediate nature of my petition. (Ex. D)

14. The Federal government is helping me with a vulture problem, an outside issue taking time away from me to prepare a defense. (Ex. E, E-mail relating to the federal government is helping me at no charge).

15. On January 13, 2022, I filed a motion for an immediate emergency decision on my January 12, 2022 motion to appeal of the Board's order, due to the fact the court only had 4, now 3 days, to respond to the motion. (Ex F)

16. I have not been delaying in my assertions of protected rights to defend my Constitutionally protected activity, including the right to cross examine pursuant to the 6th Amend., in a proceeding likened to a criminal proceeding.

17. It was not until December 30, 2021 that the Delaware Supreme Court permitted me to represent myself.

18. The testimony of Chief Justice Sights is required to determine how my first and second petition relating to attorney dues were examined by the Delaware Supreme Court in order that I may have a clearer picture as to whether the entire Supreme Court incited the petition and interference in an active case, why the Court did not respond to my second petition relating to attorney dues, and whether he or the court or an agent of the court submitted my petition to the board to incite the Supreme Court's arm's attacks against me, interfering with an active case in known violation of 42 USC 1985(2).

19. I will need to cross examine Chief Justice Sights in person to determine and show whether Disciplinary Rule 11 relating to immunity does not apply according to the elements outlined in by the Third Circuit *Saucier test*.

20. The Supreme Court's *two-step Saucier* analysis governs whether a government official is entitled to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015)

21. I also require subpoenas for Judge Clark and Arline Simmons to show illegality of motive for the proceeding.

22. Chief Justice, the Supreme Court, Judge Clark, the ODC knew or should have known that seeking to use the cloak of government authority, under the color of regulatory law, to chill or condemn or interfere with my ability to bring *Kelly v Trump* without government retaliation or pressure, violates my First Amendment Right to petition the Court, and arguably my fundamental right to speak, exercise of religion, and associate relating to my communications in my pleadings in *Kelly v Trump*, and communications in general.

23. My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right. My right to a fair and impartial proceeding before the Board is a constitutional right too.

24. The Board's failure to grant proper notice, allow for opportunity to build and make a defense violates my right. In addition, a forum partial towards the state against me, also violates my right for a fair proceeding in contravention to

the Substantive and Procedural due process provisions and the protections I am afforded under the Equal Protections Clause against disparate treatment, and punishment by bringing a petition against me but for disagreeing with my exercise of fundamental rights.

25. “Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 717 (2010); See, *United States v. Nixon*, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974) (“In the performance of assigned constitutional duties each branch of the Government must initially interpret the Constitution, and the interpretation of its powers”).

26. I will suffer continued irreparable harm if I am unable to gather testimony and facts to provide a defense of dismissal of the petition, based on subject matter and illegal, as brought, under the facts of the case, to chill the exercise of my fundamental rights, thereby chilling the rights of others by such unconstitutional precedent. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Mullin v. Sussex Cnty., Delaware*, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, *Indian River Sch. Dist.*, 653 F.3d at 283 n. 14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

27. The ODC may have power, but it does not have the power to act above the law, above the Constitution. Even I, an accused respondent am afforded Constitutional rights, including but not limited to the right for a fair and impartial proceeding, right for an opportunity to prepare a defense, right to be heard, right to notice, right to free speech, association, religious exercise, and the fundamental right to petition the courts for relief.

28. The right for opportunity at justice is not a guarantee. It is the right to petition the Court without retaliatory petitions and state punishment, that must be protected or then only the state may selectively apply who has rights or not in violation of the Equal Protections Clause.

29. Courts are a government service of the people, created to govern and guide not control, not exploit people for the bottom line.

30. The government does not run on money. The government runs on individual free choice, the collective free choice of the many who agree to respect the Constitutional laws protections of all people regardless of race, religion, poverty, gender, age or place of association.

31. When individuals within government no longer respect the Constitutional laws that make us free, we are no longer a free people.

32. The Board and the Court must place a check to tame lawlessness with the impartial rule of law, taming its own selfish desires at times, laying down their members' desires in order to care to see, know and love the people they serve.

33. The courts are not a business. Justice is not for sale, rendering those who have money, connections, and influence to exchange, with the ability to buy or barter for decisions, tipping the scales of bought injustice, eliminating freedom, making rights for sale by those who can buy them, in violation of the Equal Protections Clause.

34. I ask for a fair opportunity to research, gather facts, potentially even subpoenaing Mark Vavala, as I want to get a clearer picture of the Delaware Supreme Court's involvement in inciting this unconstitutional petition against me.

35. Even if the Delaware Supreme Court may have had pure motives, concerns relating to poverty to incite DE-Lapp's interference and investigations, they knew or should have known that the Court's armed interference of an active case was a violation of the Constitution and Federal Law.

36. I also would like time to consider Subpoenaing members of De-Lapp before a hearing too.

37. I would like to consider ask the lady who complained to Patricia based on my religious beliefs, whether she made such complaint in retaliation of my

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complaint to the courts relating to disparate treatment of being black balled at CLE's as if I am no longer a member of the profession.

38. I believe the CLE taught people to go the way to hell, and tried to make her understand how psychological teachings to live based on conditioned desires, instead of laying down desires to care to know, to love, mislead people she misguided to harm and hell.

39. I believe those without eternal life live based on what they or others want, their dreams, their desires, instead of laying down the vanities of men, to do what God desires, also known as God's will, which takes the use of our brains, our conscience mind and free, not conditioned choice to love God and one another.

40. I believe mental health workers, psychologists and behavioral theories teach the mark of the beast, the way to hell, as fact. I am allowed to believe differently than the state. And the state is permitted to disagree with my religious beliefs. The state is not permitted to force their beliefs upon me with economic pressure, or pressure to my life and liberty relating to mental health proceedings, to punish me for my individual freedom of exercising of fundamental rights.

41. The CLE's and professional courses leave little room for improvement through open dialogue of its members, debate, finding flaws in solution. Instead, they create a conditioned, controlled, forced conformity of standards which stifle debate by rejection of criticism, and punishment for it.

42. The Free exercise of speech, association, right to petition, and religious exercise, and freedom of conscience have not been sold, making it not a freedom, but a bargaining chip to exchange by relinquishment to serve business greed.

43. I believe business greed is the mark of the beast spoken of in the bible, the mark of lawlessness, without the just rule of law from restraining entities and individuals from killing, stealing and destroying humanity to worship money and material gain as God, in place of God.

44. Business greed has wrongfully been declared the law. Experts are rendered to be the law by the Courts, supporting bought experts to serve material gain in entities, not for profits, religious organizations, charities and for profits alike.

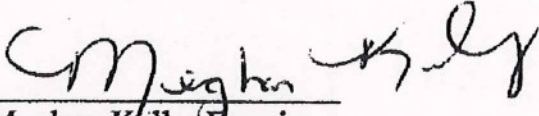
45. Business greed is lawlessness. Business is not lawlessness. When businesses kill, steal and destroy with no restraint in the form of just laws, or justice in the courts, that is lawlessness.

46. I pray the Court and the Board will tame business greed with the just rule of law to be my hero in this case, not allowing business greed of the professional association of lawyers to eliminate the rule of Constitutional laws that grant me, a member of their profession freedoms, and the hero of the world in cases unrelated to mine.

Wherefore, I pray the Board grants my motion, and allows for time, to gather more information to research, perform discovery to prepare my defense, and allowance of subpoenas for witnesses.

Dated Jan. 15, 2022

Respectfully submitted,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Not acting as attorney advocate
Bar No. 4968

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I declare that the foregoing statement is true and correct under the penalty of perjury.

Dated: January 15 2022

Meghan Kelly (printed)

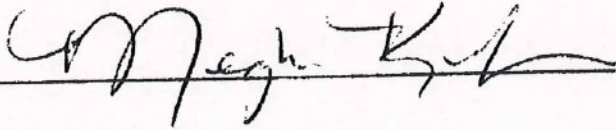
 (signed)

Exhibit A

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Product	Qty	Unit Price	Price
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First-Class Mail® Letter	1		\$0.78
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Weight: 0 lb 1.60 oz			
Estimated Delivery Date			
Tue 12/21/2021			
Certified Mail®			\$3.75
Tracking #:			
70210350000131665721			
Affixed Postage			-\$1.16
Affixed Amount: \$1.16			
Total			\$3.37

First-Class Mail® Letter	1		\$0.78
Wilmington, DE 19801			
Weight: 0 lb 1.60 oz			
Estimated Delivery Date			
Tue 12/21/2021			
Certified Mail®			\$3.75
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70210350000131665714			
Affixed Postage			-\$1.16
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Total			\$3.37

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Adult Signature Restricted Delivery \$0.00

Postage \$0.78

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Exhibit B

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Product	Qty	Unit Price	Price
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First-Class Mail® Large Envelope Wilmington, DE 19801 Weight: 0 lb 10.30 oz Estimated Delivery Date Mon 01/03/2022	1		\$3.16
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First-Class Mail® Large Envelope Dover, DE 19901 Weight: 0 lb 11.30 oz Estimated Delivery Date Mon 01/03/2022	1		\$3.36
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Grand Total:			\$9.48
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Change			-\$10.52

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or call 1-800-410-7420.

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Exhibit C

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Re: Moot/Order made/ No new Motion-Re: CONFIDENTIAL ODC FILE No. 115327-B/Misc 541

From: Meg Kelly (meghankellyesq@yahoo.com)

To: angela.james@delaware.gov

Cc: patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov; supreme_court_bprfilings@delaware.gov; lisa.dolph@delaware.gov; meghankellyesq@yahoo.com

Date: Thursday, January 13, 2022, 02:35 PM EST

Good afternoon,

To clarify, with regards to the outstanding motion, I mean my motion to appeal with the Delaware Supreme Court. No new motions have been made with the Board since they rendered an Order.

Thank you,
Meghan Kelly
34012 Shawnee Dr.
Dagsboro, DE 19939
meghankellyesq@yahoo.com

On Thursday, January 13, 2022, 02:13:14 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good afternoon,

An order was already rendered, and a new motion has not been made.

I am not required to reply to a response, when an order has been rendered, no matter how much I am tempted to contest the assertions in the reply. My response would be moot.

The standards of a fair proceeding have not been thrown out the window, merely because the venue is with the Board of Professional Conduct of the Supreme Court of the State of Delaware, which uses the Superior Court Rules of Civil procedure.

I am copying the Delaware Supreme Court since Karlis P. Johnson indicated the documents are not e-filed in a docket, in light of my outstanding motion.

Have a good afternoon.

Very truly,
Meghan Kelly
34012 Shawnee Dr.
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Acting as the accused party, not as an advocate on behalf of another

On Thursday, January 13, 2022, 01:37:03 PM EST, James, Angela D (Courts) <angela.james@delaware.gov> wrote:

Dear Ms. Kelly:

Please see the attached Response to Respondent's Motion for Continuance in reference to the above-captioned matter.

Thank you.

Angela James

Paralegal

Office of Disciplinary Counsel

The Renaissance Centre

405 North King Street, Suite 420

Wilmington, DE 19801

(302) 651-3931

(302) 651-3939 (fax)



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No 541/ Bd 11537B Meg Kelly's Motion for immediate expedited review of Jan 12th Motion

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme_courtfilings@delaware.gov; lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov;
meghankellyesq@yahoo.com

Date: Thursday, January 13, 2022, 04:00 PM EST

Good evening,

On the bottom of the motion I filed yesterday, I asked for expedited relief. But we only have 4 days the Court convenes before it is too late to render an order.

So, attached, please find a motion for immediate relief relating to the motion I filed yesterday.

Thank you for your time and attention to this important matter.

Good night,
Meghan Kelly*
34012 Shawnee Dr.
Dagsboro, DE 19939
meghankellyesq@yahoo.com



Cert of Serv.pdf
1.3MB



Cert of word count.pdf
47.7kB



Drafted Order Emergency.pdf
108kB



Motion for immediate Expedited Relief.pdf
111.6kB

Exhibit D

Case: 22-3372 Document: 57-14 Page: 27 Date Filed: 07/11/2023

Re: (1)Motion to suspend hearing until opportunity to build a case Appeal / Bd 11537B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme_court_bprfilings@delaware.gov; supreme_courtfilings@delaware.gov; patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov; meghankellyesq@yahoo.com

Date: Wednesday, January 12, 2022, 03:37 PM EST

I apologize. I have a correction. You will see in the exhibits the federal government is helping me with vultures. I have to block out a time for them to come, which may interfere with scheduling.

Thank you,
Meg
Meghan Kelly
34012 Shawnee Dr. Dagsboro,
DE 19939
meghankellyesq@yahoo.com

On Wednesday, January 12, 2022, 02:28:33 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Afternoon,

Attached, please find my motion to appeal the Order the Board rendered, and additional emails will include additional exhibits.

I am copying the Board to keep them in the loop should things change. I apologize for typos. I am a poor typist. In 9th grade I switched out of typing so as not to affect my high school GPA. Bad choice. Learning is most important, not winning or being on top of others for temporary reward. Sorry.

Thank you,
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939
meghankellyesq@yahoo.com

Fw: Vulture problem 541 bd case 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme_court_bprfilings@delaware.gov; supreme_courtfilings@delaware.gov; karlis.johnson@delaware.gov; patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com

Date: Wednesday, January 12, 2022, 04:25 PM EST

Good afternoon,

Per the message below, the federal government agreed to help stop the vultures from chasing me and attacking me. I saw it was merely the DNREC email I attached.

I apologize for the typo, and other typos. Time is not on my side. I cannot waive fundamental rights.

Thank you,
Meghan Kelly
34012 Shawnee Dr.
Dagsboro, DE 19939
meghankellyesq@yahoo.com
No 4968
Not acting as an attorney advocate

----- Forwarded Message -----

From: Michaels, Trevor A - APHIS <trevor.a.michaels@usda.gov>
To: meghankellyesq@yahoo.com <meghankellyesq@yahoo.com>
Sent: Thursday, January 6, 2022, 12:00:07 PM EST
Subject: Vulture problem

Good morning,

Your name and email was forwarded to us by DNREC in regards to vulture issues. We would be happy to assist with the issue if possible. It sounds like the use of a loaner laser or pyrotechnics (by one of our staff) may be the best course of action depending on the site layout. Would it be permissible to send someone out for a site visit to assist? If so, is there a day/time that would work best? Thank you,

Trevor Michaels

District Supervisor APHIS MD/DE/DC Wildlife Services

Chesapeake Bay Nutria Eradication Project

2145 Key Wallace Dr.

Cambridge, MD 21613

Office: 443-225-7430

Cell: 443-205-2726

Trevor.a.michaels@usda.gov

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Exhibit E

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RE: Vulture problem

From: Michaels, Trevor A - APHIS (trevor.a.michaels@usda.gov)
To: meghankellyesq@yahoo.com
Date: Monday, January 10, 2022, 08:12 AM EST

Ms. Kelly,

There would be no charge for a site visit or loaner laser, or if our employee were to use pyrotechniques on site. However, the laser would need to be returned when the problem is resolved (we could pick it up). Just let me know if you would like us to come out for a site visit. Thank you,

Trevor Michaels
District Supervisor APHIS MD/DE/DC Wildlife Services
Chesapeake Bay Nutria Eradication Project
2145 Key Wallace Dr.
Cambridge, MD 21613
Office: 443-225-7430
Cell: 443-205-2726
Trevor.a.michaels@usda.gov

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Sunday, January 9, 2022 7:50 AM
To: Michaels, Trevor A - APHIS <trevor.a.michaels@usda.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Re: Vulture problem

Hello,

I apologize for writing on the weekend. I am scared. The vultures peck at the skylights and windows. They do not go away when I yell at them. They just look at me.

I am getting sued by the government for my faith in Jesus Christ. They think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money.

I have papers everywhere and am fighting for my life and liberty. The trial against me is scheduled Thursday, Jan 13, 2022, despite the fact I did not receive proper notice, and requested an opportunity to conduct discovery to show the action is illegal and to show the state does not have subject matter jurisdiction against me. I sued the Presidents to dissolve executive orders that pay churches to perform government business under the guise of charity, when it is business, not unconditional charitable love. This is a step to eliminate governments' function of welfare, eliminating social security and other government welfare programs, allowing lawless greed to reign by entities without hearts who have no power to do good as individual humans may through unconditional love. These entities will not be tempered with just laws, or the law of love written on the hearts of man. I read the plans the Fourth Industrial Revolution and the Great Reset and review the laws and see there is a workable plan through unjust policies to eliminate private property and make everything and everyone no longer free but for sale to be rented out. Schemes may be undone.

I do not feel well. I lose five pounds of water weight due to a surgery I had 20 plus years ago. So, I think the vultures see I am weak, and 100s of them may attack me. It is creepy the vultures do not go away when I scream at them on the inside of the house. It is like I am trapped. Since they swooped in on me a few times, I am scared to go to the car and mailbox when no other person is outside.

Thank you for caring to help the least of these. This is unusual. Their aggressive behavior is not normal.

Thank you,

Meg

On Thursday, January 6, 2022, 12:00:07 PM EST, Michaels, Trevor A - APHIS <trevor.a.michaels@usda.gov> wrote:

Good morning,

Your name and email was forwarded to us by DNREC in regards to vulture issues. We would be happy to assist with the issue if possible. It sounds like the use of a loaner laser or pyrotechnics (by one of our staff) may be the best course of action depending on the site layout. Would it be permissible to send someone out for a site visit to assist? If so, is there a day/time that would work best? Thank you,

Trevor Michaels

District Supervisor APHIS MD/DE/DC Wildlife Services

Chesapeake Bay Nutria Eradication Project

2145 Key Wallace Dr.

Cambridge, MD 21613

Office: 443-225-7430

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Cell: 443-205-2726

Trevor.a.michaels@usda.gov

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MK

Exhibit E^UF

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No 541/ Bd 11537B Meg Kelly's Motion for immediate expedited review of Jan 12th Motion

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme_courtfilings@delaware.gov; lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov;
meghankellyesq@yahoo.com

Date: Thursday, January 13, 2022, 04:00 PM EST

Good evening,

On the bottom of the motion I filed yesterday, I asked for expedited relief. But we only have 4 days the Court convenes before it is too late to render an order.

So, attached, please find a motion for immediate relief relating to the motion I filed yesterday.

Thank you for your time and attention to this important matter.

Good night,
Meghan Kelly*
34012 Shawnee Dr.
Dagsboro, DE 19939
meghankellyesq@yahoo.com



Cert of Serv.pdf
1.3MB



Cert of word count.pdf
47.7kB



Drafted Order Emergency.pdf
108kB



Motion for immediate Expedited Relief.pdf
111.6kB

**THE SUPREME COURT OF THE STATE OF DELAWARE
BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF THE STATE OF DELAWARE**

In the Matter of a Member of the Bar of the) Board Case No. 115327-B
Supreme Court of the state of Delaware) Misc. 541
Meghan M. Kelly, respondent.)

**EMERGENCY MOTION FOR IMMEDIATE RELIEF
REQUESTING REVIEW OF
RESPONDENT’S MOTION APPEALING ORDER
OF THE BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF THE STATE OF DELAWARE DATED
JANUARY 11, 2022,**

**GRANTING POSTPONEMENT OF HEARING FOR 8 DAYS
DUE TO ILLNESS, NOT A REASON IDENTIFIED IN MY MOTION TO
GRANT POSTPONEMENT TO AFFORD ME OPPORTUNITY TO
PREPARE A DEFENSE, PERFORM DISCOVERY, RESEARCH, FILE
MOTIONS, BE HEARD ON OUTSTANDING MOTION(S)
UNADDRESSED BY THE BOARD, TO DEFEND MY EXERCISE OF
FUNDAMENTAL RIGHTS AND TO PRESERVE MY LICENSE TO
PRACTICE LAW, ON THE GROUNDS THE AMOUNT OF TIME IS NOT
ENOUGH AND A HEARING DATE SHOULD BE POSTPONED UNTIL
AFTER A FAIR OPPORTUNITY TO BUILD A DEFENSE IS GRANTED**

AND NOW this January 13, 2022, respondent, Meghan M. Kelly, pro se,
pursuant to the Substantive and Procedural Due Process Clause and the Equal
Protections Clause applicable to the state pursuant to the 14th Amend., and the 1st
Amend. applicable to the state pursuant to the 14th Amend., respectfully requests
the Delaware Supreme Court grant immediate emergency relief by reviewing her
motion to appeal, dated January 12, 2022, entitled, *Respondent Meghan M. Kelly’s
Appeal of the Order of the Board on Professional Responsibility of the Supreme*

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Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in her motion to grant postponement to afford her opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend her exercise of fundamental rights and to preserve her license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense, dated January 12, 2021.

1. Respondent apologizes to the Court regarding typos in her motion, and prays the court has mercy on her in light of the hardship of her circumstances.

2. There are only 4 full working days before the hearing, now scheduled for January 21, 2022, affording little time for the Court to respond to give sufficient notice of its decision to all parties involved.

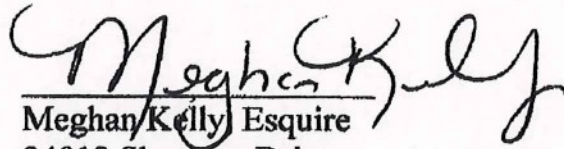
3. The Court does not convene on Monday, a holiday.

4. I respectfully ask the Court to review my motion to appeal, dated January 12, 2021, immediately, on an expedited basis, in order to make a determination swiftly.

Wherefore I pray the Court expedites and grants immediate relief on my motion.

Dated Jan. 13, 2022

Respectfully submitted,



Meghan Kelly Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Not acting as attorney advocate
Bar No. 4968

(word Count 298)

I declare that the foregoing statement is true and correct under the penalty of perjury.

Dated: January 13, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

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